ORIGINAL

BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON, D.C. 20268-0001

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Mailing Online Service   )

Docket No. MC98-1

OFFICE OF THE CONSUMER ADVOCATE
INTERROGATORIES TO UNITED STATES POSTAL SERVICE
WITNESS: DANIEL STIREWALT
(OCA/USPS-T3-50-60)
October 5, 1998

Pursuant to sections 25 and 26 of the Rules of Practice of the Postal Rate

Commission, the Office of the Consumer Advocate hereby submits interrogatories and

requests for production of documents. Instructions included with OCA interrogatories

OCA/USPS-T1-1-7 to witness Lee Garvey, dated July 21, 1998, are hereby
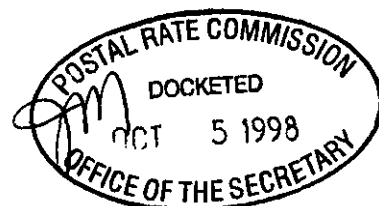
incorporated by reference.

Respectfully submitted,

Gail Willette

Gail Willette
Acting Director
Office of the Consumer Advocate

Emmett Rand Costich

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Acting Assistant Director

OCA/USPS-T3-50.   Please refer to the column "YR 1999 Estimate," section

"PROCESSING CENTER—DATA STORAGE, Mail Lists" at Tr. 3/723-24.

a.   Please confirm that the number, 230.04, is expressed in units of

"sessions/business day." If you do not confirm, please show the derivation of the

correct units. Please explain why this same number is variously identified as

"Customer sessions per business day" at Tr. 3/720, "Total Transactions Per Day"

at Tr. 3/722, and "Total Documents Per Day" at Tr. 3/722.

b.   Please confirm that the number, 1,150, is expressed in units of "sessions/week."

If you do not confirm, please show the derivation of the correct units. Please

confirm that the formula for computing this number is (230.04 sessions/business

day) * (5 business days/week). If you do not confirm, please provide the correct

formula. Please confirm that when originally calculating the number 230.04 you

assumed that there are 6 business days per week ("6 day work week assumed,"

Tr. 3/720). If you do not confirm, please explain. Please reconcile the 6-day

week used at page 720 with the 5-day week used at page 723.

c.   Please confirm that the number, 59,810, is expressed in units of "sessions/year."

If you do not confirm, please show the derivation of the correct units. Please

confirm that in computing this number, you have assumed 260 business days

per year. If you do not confirm, please explain. Please confirm that when

originally calculating the number 230.04 you assumed that there are 312

business days per year ("Calculated (sessions per year / 312 business days in a

year, . . .)" Tr. 3/720). Please confirm that "sessions/year" can be calculated

directly from page 720 as (5981 users) * (12 sessions/user/year) = 71,772

sessions/year. See Tr. 4/858. If you do not confirm, please explain.

d.   Please confirm that the number, 4,120, is expressed in units of "pieces/session."

If you do not confirm, please show the derivation of the correct units. Please

explain why this same number is variously identified as "Number of Addresses

Per Mailing List" at Tr. 3/720, "Average mailing pieces per document" at Tr.

3/721, and "Number of Addresses Per Mailing List" at Tr. 3/723.

e.   Please confirm that the number, 200, is expressed in units of "bytes/piece." If

you do not confirm, please show the derivation of the correct units. Please state

the file format for addresses—e.g., PDF, Postscript, other (specify). Is this

format independent of whether the address is associated with a mail merge or

non-mail merge job?

f.   Please confirm that the number, 823,901, is expressed in units of

"bytes/session." If you do not confirm, please show the derivation of the correct

units. Please state the file format for mailing lists—e.g., PDF, Postscript, other

(specify). Is this format independent of whether the list is associated with a mail

merge or non-mail merge job? What is current practice?

g.   Please confirm that the number, 30, is expressed in units of "days." If you do not

confirm, please show the derivation of the correct units. Please explain why this

number differs from the on-line storage duration (1 day) for financial transactions

at Tr. 3/722. What is current practice?

h.   Please confirm that the number, 90, is expressed in units of "days." If you do not

confirm, please show the derivation of the correct units. Please explain why this

number differs from the backup storage duration (180 days) for financial

transactions at Tr. 3/722. What is current practice?

i.   Please confirm that the number, 120, is expressed in units of "days." If you do

not confirm, please show the derivation of the correct units. Please explain why

the duration for *archival* storage of addresses should be shorter than the

duration for both *backup* storage (180 days) and archival storage (1460 days) of

financial transactions at Tr. 3/722. What is current practice?

j.   Please confirm that the number, 0.15, is a pure number with no units associated

with it. If you do not confirm, please show the derivation of the correct units.

What compression ratios are actually being obtained at present?

k.   Please confirm that the number, 852,879,807.7, is expressed in units of "bytes."

If you do not confirm, please show the derivation of the correct units. Please

confirm that this storage requirement will be much smaller at the beginning of

1999 and much larger at the end of 1999 if volume grows during the year. If you

do not confirm, please explain.

l.   Please confirm that the number, 2,558,639,423, is expressed in units of "bytes."

If you do not confirm, please show the derivation of the correct units. Please

confirm that this storage requirement will be much smaller at the beginning of

1999 and much larger at the end of 1999 if volume grows during the year. If you

do not confirm, please explain.

m.   Please confirm that the number, 3,411,519,231, is expressed in units of "bytes."

If you do not confirm, please show the derivation of the correct units. Please

confirm that this storage requirement will be much smaller at the beginning of

1999 and much larger at the end of 1999 if volume grows during the year. If you

do not confirm, please explain.

OCA/USPS-T3-51.   Please refer to the column "YR 1999 Estimate," section

"PROCESSING CENTER—APPLICATION SERVER, Backup Financial Transactions

(Night Only)" at Tr. 3/724.

a.   The number, 221, is sourced to "ATTACHMENT E." Please provide a copy of or

         citation to "ATTACHMENT E."

b.   The number, 30, is sourced as "Four hour estimated nightly maintenance

         period/8." Please explain the rationale for (1) choosing a four-hour period and

         (2) allocating one-eighth of that period to financial transactions backup.

OCA/USPS-T3-52. Please refer to USPS-LR-1/MC98-1, Attachment 1, at page 10,

section "PROCESSING CENTER—APPLICATION SERVER, Backup PDF Files (Night

Only)," in the column "YR 1999 Estimate."

a.   Please confirm that the figure, 230.04, is expressed in units of

         "sessions/business day." If you do not confirm, please show the derivation of the

         proper units.

b.   Please confirm that the figure, 320.78, is expressed in units of

         "(sessions/business day * (bytes/page (PDF)))/sec." Please confirm that the

         correct units should be "(bytes (PDF)/business day)/sec." If you do not confirm,

         please show the derivation of the proper units.

c.   Please confirm that the formula used to calculate the figure 320.78 should

contain the multiplicative terms 3.2 pages per piece, 4,120 pieces per session,

and 0.5 mail merge factor yielding 2,114,299.573 "(bytes (PDF)/business

day)/sec." If you do not confirm, please explain.

OCA/USPS-T3-53. Please refer to USPS-LR-1/MC98-1, Attachment 1, at page 10,

section "PROCESSING CENTER—APPLICATION SERVER, Backup Postscript Files

For Non-Mail Merge Jobs (Night Only)," in the "SOURCE" column. With respect to the

"Number of pages per Document," please provide, in hardcopy and electronic form, a

copy of or citation to the "Feasibility Study."

OCA/USPS-T3-54. Please refer to USPS-LR-1/MC98-1, Attachment 1, at page 10,

section "PROCESSING CENTER—APPLICATION SERVER, Backup Postscript Files

For Non-Mail Merge Jobs (Night Only)," in the column "YR 1999 Estimate."

a.   Please confirm that the figure, 3, is expressed in units of "pages/piece." If you

do not confirm, please show the derivation of the proper units.

b.   Please confirm that the figure referred to in part (a) of this interrogatory should

be 3.2 "pages/piece." If you do not confirm, please show the derivation of the

number 3.

c.   Please confirm that the figure, 5888.98, is expressed in units of

"((sessions/business day) * (bytes (Postscript)/pieces)))/sec." Please confirm

that the correct units should be "(bytes (Postscript)/business day)/sec." If you do

not confirm, please show the derivation of the proper units.

d.   Please confirm that the formula used to calculate the figure 5888.98 should

        contain the multiplicative terms 3.2 pages per piece, 4,120 pieces per session,

        and 0.5 mail merge factor yielding 12,938,502.56 "(bytes (Postscript)/business

        day)/sec." If you do not confirm, please explain.

OCA/USPS-T3-55. Please refer to USPS-LR-1/MC98-1, Attachment 1, at pages 10

and 11, section "PROCESSING CENTER—APPLICATION SERVER, Backup Mail

Lists," in the column "YR 1999 Estimate." Please confirm that the figure, 26323.45, is

expressed in units of "(bytes/business day)/sec." If you do not confirm, please show the

derivation of the proper units.

OCA/USPS-T3-56. Please refer to USPS-LR-1/MC98-1, Attachment 1, at pages 10

and 11.

a.   Please confirm that the "Bytes Per Second" for Backup Financial Transactions

        (Night Only), Backup PDF Files (Night Only), Backup Postscript Files for Non-

        Mail Merge Jobs (Night Only) and Backup Mail Lists, is 28.24, 320.78, 5888.98,

        and 26323.45, respectively. If you do not confirm, please explain.

b.   Please explain why the bytes per second referred to in part (a) of this

        interrogatory are not equal.

c.   Please confirm that the bytes per second referred to in part (a) of this

        interrogatory should be the same; that is, expressed in the same rate per

        second. If you do not confirm, please explain.

d.   Please confirm that the correct calculation for Backup Financial Transactions

(Night Only), Backup PDF Files (Night Only), Backup Postscript Files for Non-

Mail Merge Jobs (Night Only) and Backup Mail Lists, is the sum of the

"(bytes/business day)" for Backup Financial Transactions (Night Only), Backup

PDF Files (Night Only), Backup Postscript Files for Non-Mail Merge Jobs (Night

Only) and Backup Mail Lists divided by the 14,400-second backup period. If you

do not confirm, please explain.

OCA/USPS-T3-57. Please refer to USPS-LR-1/MC98-1, Attachment 1, at page 11,

section TECHNICAL HELP DESK RESOURCE YEARS, Help Desk Volumes/Durations,

in the column YR 1999 Estimate.

a.   Please confirm that the figure, 2,991, is expressed in units of "hours." If you do

not confirm, please show the derivation of the proper units.

b.   Please confirm that the figure, 1,794, is expressed in units of "hours." If you do

not confirm, please show the derivation of the proper units.

c.   Please confirm that the figure, 4,785, is expressed in units of "hours." If you do

not confirm, please show the derivation of the proper units.

d.   Please confirm that the figure, 2.66, is expressed in units of "resource year." If

you do not confirm, please show the derivation of the correct units.

e.   Please confirm that the figure, 0.5, is a pure number with no associated units. If

you do not confirm, please show the derivation of the proper units.

f.   Please confirm that the figure, 2,392, is expressed in units of "hours." If you do

not confirm, please show the derivation of the proper units.

g.   Please confirm that the figure, 1.33, is expressed in units of "resource years." If

you do not confirm, please show the derivation of the correct units.

h.   Please confirm that the figure referred to in part (f) of this interrogatory is not

used in the calculation of the figure, 1.33, "resource years" or for any other

purpose. If you do not confirm, please explain.

OCA/USPS-T3-58.   Please refer to page 1 of your Cost Component Sources/

Derivations Worksheet, Tr. 3/733. The spreadsheet at the bottom of that page

summarizes On-line Storage Requirements.

a.   Please confirm that the entries in that spreadsheet for rows labeled "Item #8 PDF

files" and "Item #11 Postscript files" are incorrect. (See OCA/USPS-T3-48(b),

49(d).) If you do not confirm, please explain.

b.   Please confirm that when the entries in that spreadsheet for rows labeled "Item

#8 PDF files" and "Item #11 Postscript files" are corrected, the Total On-line

Storage Requirement exceeds capacity for all years except 1999. If you do not

confirm, please explain.

OCA/USPS-T3-59.   Please refer to page 2 of your Cost Component Sources/

Derivations Worksheet, Tr. 3/734. The spreadsheet at the top of that page summarizes

Backup Data Storage Requirements.

a.   Please confirm that the entries in that spreadsheet for rows labeled "Item #9 PDF

files" and "Item #12 Postscript files" are incorrect. (See OCA/USPS-T3-48(d),

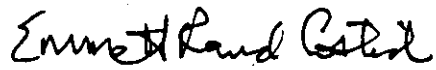49(f).) If you do not confirm, please explain.

b.   Please confirm that when the entries in that spreadsheet for rows labeled "Item #9 PDF files" and "Item #12 Postscript files" are corrected, the Total On-line Storage Requirement exceeds capacity in 2003. If you do not confirm, please explain.

OCA/USPS-T3-60.   Please refer to page 2 of your Cost Component Sources/ Derivations Worksheet, Tr. 3/734. The spreadsheet in the middle of that page summarizes Archive Data Storage Requirements.

a.   Please confirm that the entries in that spreadsheet for rows labeled "Item #7 Financial Transactions," "Item #10 PDF files," and "Item #13 Postscript files" are incorrect. (Compare Tr. 3/722, Item #7 with Tr. 3/734, Item #7; see OCA/USPS-T3-48(f), 49(h).) If you do not confirm, please explain.

b.   Please confirm that when the entries in that spreadsheet for rows labeled "Item #7 Financial Transactions," "Item #10 PDF files," and "Item #13 Postscript files" are corrected, the Total On-line Storage Requirement exceeds capacity in all years except 1999 and 2000. If you do not confirm, please explain.

CERTIFICATE OF SERVICE

I hereby certify that I have this date served the foregoing document upon all

participants of record in this proceeding in accordance with section 12 of the rules of

practice.

Emmett Rand Costich
Attorney

Washington, D.C. 20268-0001
October 5, 1998